## EXHIBIT 1

## Sarah A. Ramsey

Subject:

FW: Smith: Wiley Deposition

From: Adam Engel [mailto:aengel@meclaw.net]

Sent: Tuesday, January 08, 2019 2:51 PM
To: Greg Andrews < greg@andrews.law >
Cc: Gerard Pignato PCL < jerry@rkcglaw.com >

**Subject:** Smith: Wiley Deposition

Mr. Andrews – It was good seeing you yesterday and I hope your new year is off to a good start. As you know, today is the last day of discovery on this case. We've agreed to take two depositions after the discovery period while the judge reads the summary judgment motions. On several occasions, I've offered to present Mr. Wiley for his deposition. I wanted to let you know that I would be willing to provide you the same courtesy by extending the offer to present him for his deposition after today. If you'd like to take his deposition, please send your availability.

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